

The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

INVESTIGATION INTO SERVICE QUALITY GUIDELINES D.T.E. 04-116

FIRST SET OF INFORMATION REQUEST OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BAY STATE GAS COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits the following information request(s) to Bay State Gas Company ("Bay State" or "Company") with respect to <u>Investigation into Service Quality Guidelines</u>, D.T.E. 04-116.

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

- 1. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, and one copy of the responses to Jody M. Stiefel, Hearing Officer. Submit copies of the Company's responses to the information requests to the Department by 10:00 a.m., June 23, 2005. In addition to filing, all non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us, jody.stiefel@state.ma.us, and to the e-mail address of any party required to be served.
- 2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 3. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 4. These requests shall be deemed continuing so as to require further supplemental

responses if the party or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

5. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

- 6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
- 7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

D.T.E. 04-116 Page 3

First Set of Information Requests to Bay State Gas Company

Request

DTE-BSG 1-1

Refer to the Company's response to DTE-GAS 1-4. Please provide a copy of the Service Quality Plan settlement between Northern Utilities, the Maine Office of the Public Advocate and the Maine Public Utilities Commission staff which details the service quality data measurement, collection and reporting techniques Northern Utilities is to use.